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HAZARDOUS WASTE
COMPLIANCE ASSESSMENT REPORT

TO: Karen G. J'Anthony KGJA

FROM: Alan H. Simpson AHS

DATE: August 24, 1994

SUBJECT: CSE at Procino Plating, Inc., Blades, Delaware on August 18, 1994

REFERENCE: DED 982362543, File Code: 21

GENERATOR SITE ADDRESS: Procino Plating, Inc.
901 S. Market Street
Blades, Delaware 19973

GENERATOR MAILING ADDRESS: Same As Site Address

SITE REPRESENTATIVE: Patrick Procino, President and Owner
(302) 629-0331

HWMB REPRESENTATIVE: Alan H. Simpson and Patty Buckley

DATE OF INSPECTION: August 18, 1994

PURPOSE OF INSPECTION: CSE (follow-up to May 19, 1994 inspection)

PRE-INSPECTION SAFETY PREPARATION

Based on my May 19, 1994 inspection, I determined that steel toed boots, a hard hat, and safety glasses with side shields were adequate safety equipment.

AUGUST 18, 1994 FOLLOW-UP INSPECTION

On August 18, 1994 Patty Buckley and myself reinspected Procino Plating's hazardous waste accumulation area. We found that all six violations cited in the June 24, 1994 Notice of Violation 94-HW-19 had been corrected. (The numbering below corresponds to the N.O.V. numbering).

1. All drums of hazardous waste were properly labeled with start accumulation dates and with the words "Hazardous Waste".

2. There were no open drums of hazardous waste.

3. There was sufficient aisle space.

4. I saw an inspection log book which showed the hazardous waste accumulation area has been inspected weekly for the past month.

5. I saw that Procino Plating had a book entitled "Hazardous Waste in Delaware" and four audio cassettes on hazardous waste. Pat Procino and Mike Procino said they had read the book and listened to the tapes.

6. The July 22, 1994 letter from Patrick Procino to me states that "The evaporation system described in item #6 is no longer in use at Procino Plating, Inc." On August 18, 1994 I found that the evaporation tank was "bone dry" empty.

I filled out an inspection checklist for the accumulation area. No additional violations were found.

CONCLUSIONS

Procino Plating is now in compliance with the Regulations and has a small quantity generator status. A draft letter is attached saying procino plating has corrected all the deficiencies cited in the June 24, 1994 N.O.V.

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AHS94049

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HAZARDOUS WASTE
COMPLIANCE EVALUATION REPORT

TO: Karen G. J'Anthony KGJA

FROM: Alan H. Simpson AHS

SUBJECT: CEI at Procino Plating, Inc., Blades, Delaware on May 19, 1994

REFERENCE: DED982362543, File Code: 21

DATE: June 2, 1994

GENERATOR SITE ADDRESS: Procino Plating, Inc.
901 S. Market Street
Blades, Delaware 19973

GENERATOR MAILING ADDRESS: Same As Site Address

SITE REPRESENTATIVE:	Patrick Procino, President and Owner (302) 629-0331
HWMB REPRESENTATIVE:	Alan H. Simpson and Patti Zietlow
DATE OF INSPECTION:	May 19, 1994
PURPOSE OF INSPECTION:	CEI
FACILITY STATUS:	Small Quantity Generator based on 1992 and 1993 manifests and the latest notification (02/08/90). However, the 6,000 kilogram accumulation limit in 262.34(d) may have been exceeded.

PRE-INSPECTION SAFETY PREPARATION

Based on what I know about the plating industry, I determined that steel toed boots, a hard hat, safety glasses with side shields and a photoionization detector were adequate safety equipment.

FACILITY DESCRIPTION

Procino Plating is located on Market Street in Blades, Delaware. Typical of a plating plant, Procino plates copper, nickel, aluminum and chromium onto metal objects.

Business is by contracts from large companies as well as for one-time customers. Cyanides are only inside the rear building; acids are only inside the original front building. Everything takes place within two buildings (see photograph). Residential houses are across one street adjacent to Procino.

WASTE STREAMS

Manifests from 1992 and 1993 show two types of hazardous wastes shipped offsite; acidic chromium containing hazardous wastes (D002/D007) and sludges from plating operations (F006).

Also accumulated as hazardous waste prior to its onsite neutralization are acidic nickel and copper wastes. I also found accumulated as hazardous wastes, copper cyanide, and various acid and basic strippers.

HAZARDOUS WASTE TREATMENT

Acidic plating hazardous waste (D002) solutions containing copper and nickel are transferred from accumulation drums into an open topped tank located inside the shipping and receiving dock. The acidic solution is brought to a high enough pH by the addition of sodium hydroxide, that the copper or nickel hydroxide is precipitated. Because the solution is neutralized by this caustic addition, the solution is routed to the municipal sewer. The metal hydroxide is also not hazardous since it is either copper hydroxide or nickel hydroxide. I consider this operation to take place inside an elementary neutralization tank. The tank meets the definition of tank as found in §260.10.

Acidic hazardous waste solutions containing chromium are transferred from accumulation drums into a second open topped tank located near the elementary neutralization tank. Excess hot water from the boiler is routed through a coil which heats the chromium hazardous waste in the tank. The tank functions as an evaporator. The evaporation is helped by a wall fan. When the hazardous waste is sufficiently reduced in volume by the evaporation, the hazardous waste is transferred back into accumulation drums. Appendix I, Table 2 of Part 265, lists a treatment code of T57 for evaporation. A December 15, 1987 EPA policy memo exempts from the permit requirement, treatment inside an accumulation tank.

MAY 19, 1994 WALK THROUGH

Patti Zietlow and myself were accompanied by Patrick Procino on a walk through of all areas of both buildings and all outside areas. Specifically, we walked through the following areas:

<u>Original Building</u>

- plating room
- shipping and receiving room with hazardous waste accumulation (see checklist) and treatment areas
- room with sand blasting operation

<u>New Building</u>

- plating room
- chemical storage room

<u>Outside</u>

- back to the railroad track property line

LAND BAN

As part of this May 19, 1994 assessment of Procino Plating, Patti Zietlow examined this company's shipping records from 1992 through 1993. Included with the records of each shipment of hazardous waste was a notification. The notification form satisfied the requirements of §268.7(a)(1) of Delaware's Regulations.

CONCLUSIONS

Because the wastes accumulating in drums were not classified and labeled as hazardous or non-hazardous wastes, I am not presently satisfied that all hazardous wastes are shipped offsite as hazardous wastes. I should be able to draw a conclusion after receipt of the company's response to the N.O.V.

VIOLATIONS

- hazardous wastes in the accumulation area which were not dated and not labeled hazardous waste
- no training of management on hazardous waste requirements
- inadequate aisle space in the accumulation area
- no weekly inspections of the accumulation area
- open drums of hazardous wastes
- possible exceedance of 6,000 kilograms of hazardous waste by a small quantity generator (to be resolved by the N.O.V.)
- possible violations of tank requirements because of the evaporator operation (resolution is started by issuance of the N.O.V.)

PROCINO
AHS:trh